

Cohen, Dippell and Everist, P.C.

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Authorizing Permissive Use of the)	GN Docket No. 16-142
"Next Generation" Broadcast Television)	
Standard)	

Comments
on Behalf of
COHEN, DIPPELL AND EVERIST, P.C.

The following comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE") and is in response to the Public Notice released March 10, 2017. CDE and its predecessors have practiced before the Federal Communications Commission ("FCC") for over 75 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and performed professional consulting engineering services to the communication industry.

The undersigned is licensed as a Professional Engineer in the District of Columbia and has been in continuous employment with this firm or its predecessors for over fifty (50) years.

This Notice of Proposed Rulemaking ("NPRM") represents a future worth exploring and serious review. This will not be a simple task. The current ATSC 1.0 had to be implemented with the then current analog standard. That process was undertaken when there were more channels and over a multi-year time period. The current channel plan which will incorporate the repacking plan will be a more difficult challenge if free off-the-air reception is to remain a staple

or available to the average viewers notwithstanding where they reside in the United States.

The current off-the-air service is in competition with the numerous cable channels and all the offerings supported by hand-held devices.

It is this environment that the current off-the-air television services experience.

This is now the time to investigate all aspects of ATSC 3.0 and needs a complete technical record to be fully developed such that the FCC can provide detailed insight on how this possible new delivery method will be created into a universal allocation framework.

This firm in response to the petition indicated the following:

“This firm looks forward to the other aspects such as off-the-air reception and ATSC 3.0's ability to provide superior service in varying environments. Other aspects of signal delivery will need to be subject to scrutiny.

The promise alleged with the adoption ATSC 1.0 that it would have graceful degradation never materialized. In fact, in a varying and rapid signal environment with multiple reflections, the ATSC standard 1.0 suffers reception's impairments. This firm looks forward to a standard that achieves the goal of reliable off-the-air reception in difficult environmental conditions.

This firm filed in MM Docket No. 87-268¹ the following observations. They are abstracted as follows:

“CDE continues to believe that terrestrial off-the-air broadcasting performs and will continue to perform a necessary role in informing the general public whether it be the underprivileged or the general public. Broadcasting is the only medium that provides information at virtually no cost to the consumer, provides a wide variety of programming and is directly responsive to these viewers each rating period. It provides local information such as news, weather and sports.”

¹November 15, 1995

“We note that television service from the inception was allowed to bring a multitude of services to the general public and develop those services without any direct governmental interference. Fundamentally, television and other broadcasting mediums have served to be the vehicle from which the information revolution has been launched. Therefore, if the Commission desires this medium to continue to be in the forefront of the introduction of information to the general public, then the broadcast industry should be permitted to use the available technical tools² without impediment. Terrestrial broadcasting must be able, not only to improve its product but must have the unrestrained ability to use additional technical tools to serve the public with new and innovative services provided that it:

- (1) creates no objectionable interference to existing users and
- (2) its primary use is broadcasting to the general public.

The ability to provide these alternatives to the public is indeed remarkable, since less than ten years ago the technical opportunity for this discussion could not be made or imagined.”

The above was filed in 1995 in MM Docket 87-268 and was true then and now.

This firm believes that DTV service will be advanced through the investigation and adoption of a complete standard.”

On Page 22 of the NPRM, under Sections D and E, the FCC asked very specific questions. This firm would like to ask one more question – what will the FCC require for ATSC 1.0 and ATSC 3.0 to be the standard method that the FCC will implement to augment the current Section 73.686 of the FCC Rules entitled, “Field Strength Measurements”. It is this firm’s opinion valid field measurements for the purpose of determining the presence or absence of interference or coverage are still vitally important as they have been in prior years.

²For example, AM stereo broadcasting was available in the 1960's; however, the Commission and other interests chose to refrain from this technological possibility in order to foster FM development. The Commission later elected to revisit this question, but the outcome was not timely nor decisive enough to enable AM broadcasting to compete.

This firm looks forward to the continued technical investigation of the challenge to bring better service to the general public.

Respectfully Submitted,

COHEN, DIPPELL AND EVERIST, P.C.

A handwritten signature in dark ink, appearing to read "Donald G. Everist". The signature is fluid and cursive, with a large initial "D" and "E".

Donald G. Everist
President

DATE: May 9, 2017